NATIONAL ORGANIC STANDARDS BOARD
FINAL RECOMMENDATION ADDENDUM NUMBER 26

NOSB MATERIALS REVIEW CRITERIA

Date adopted: November 1, 1995
Location: Austin, Texas

Objective: Develop review criteria or principles for proposed synthetic farm input materials that more clearly define and elaborate on the seventh OFPA criterion for evaluation: "compatibility with a system of sustainable agriculture." These criteria must refer back to the foundation principles of organic production stated in "Prologue: Moving Towards Sustainability," and will be used to guide the NOSB and the Secretary in making decisions about whether to add a material to the National List of Allowed Synthetics. These criteria are offered in acknowledgment that adequate available scientific data may not be available to address the other six OFPA criteria. **It is important to emphasize that none of these criteria can be considered in isolation; any one may expand or diminish in importance in relation to the clarity (or ambiguity) of determinations about the others.** However, no material may be consistent with organic agriculture and appear on the National List in the absence of a strong factual showing in scientific criteria.

The Preamble to the National List (July 1995) language referencing Standards and Farm Plan requirements also applies; specifically, that the use of any allowed synthetic materials demands that the producer be making a good faith effort to find or develop alternatives that are more compatible with organic principles. Phase-out requirements are best considered in this context since the length of time for which the use of a material may be necessary will vary according to site-specific constraints which are best left to the judgement of the producer and the certifier.

1. Impact on Ecological Balances:
Organic agriculture is distinguished from conventional agriculture by its emphasis on nutrient recycling and maintaining ecological balances for soil and crop management. Therefore, the introduction of synthetically derived organisms whose interactions in the ecosystem are unpredictable should not be allowed without clear evidence that they meet all the OFPA review criteria. The risks of ecological disruption posed by such an introduction should be given stronger consideration than the short-term utility of a particular biological tool. For example,

the possibility of inducing resistance in target species to biological control agents that are unselectively introduced via plant genetic manipulation, thereby seemingly eliminating the future effectiveness of the selectively applied biological control, could override any possible short-term benefits of introducing pest-resistant crops.

Any material used for the purpose of providing crop nutrient requirements should similarly be evaluated in light of its possible disruption of soil nutrient cycles. Any material that detracts from the soil's capacity to recycle organic matter should be evaluated for its suitability in an organic system. A material that could potentially disrupt this capacity may be permitted, or at least not prohibited, with appropriate restrictions concerning acceptable applications.

2. Synthetic materials that are not analogues of non-synthetic materials should be reviewed according to the following :

a) Similarity to other synthetic materials already allowed for organic production: Does a new material have a similar function, mode of action, and ecological profile to materials previously placed on the Allowed Synthetics list?

b) Environmentally superior alternative : Does the material reduce or eliminate the need for a more environmentally destructive non-synthetic or allowed synthetic alternative? This is different from simply considering whether alternatives exist, as is required by the 6th OFPA criterion. Example: pBO.

c) Historic precedent: If the material has been accepted for use in organic systems in the past, is there a continuing basis for this acceptance? While historic precedence is not sufficient cause to allow a material that fails on the other key criteria, it would counterbalance some level of philosophical or opinion based opposition to accepting a material.

d) Consumer perception: What is the consumer and public interest community perception of the material? This is an important question when the material's profile regarding the other criteria is ambiguous. This question could be analyzed quantitatively by conducting a survey of consumer and environmental groups about a material if the evaluators were divided about its status. Another possible judgment may in some cases be that greater public benefit would result from working to change consumer perceptions and provide more information about the use and function of the material in question, and allowed synthetics in general, in organic production systems.

3. Establishment of Need: It should be assumed that at least one organic producer or handler would claim to need to use any synthetic material being considered for inclusion on the National List. The following are guidelines for evaluating the validity of a claimed need for a material.

a) Agronomic Need: The need for a material as substantiated by a diversity of producers, i.e. of more than one crop in more than one region, who are unable to achieve the necessary results through cultural practices, biological methods, or use of materials which are more fully compatible with organic principles (this coincides with the sixth OFPA criterion). Additionally, "necessary results" should also be evaluated in context of organic principles (for example, eradication of a pest specie is not a necessary or even desirable result in an organic production system.) Successful commercial (as opposed to home use or hobby) production of the same crop under similar ecological constraints without use of the material in question would represent a serious counterbalance to allowing it. Constraints such as market acceptability, labor availability and scale of production would have to be considered in the realm of economic need.

b) Economic Need: While allowance of a material cannot be justified on economic need alone, the economic impact on producers (including farm workers), handlers and consumers of allowing or prohibiting a given material should be factored into the decision. This is an assessment for which valid projections are often lacking, and for which the feasibility of more compatible alternatives becomes a subjective judgement. For example, the high cost of labor to achieve the same level of weed control provided by an herbicide could not be a valid argument

for allowing an herbicide that otherwise fails the agronomic need test.

It becomes trickier with arguments such as the one made by California growers that Chilean nitrate is needed in order to maintain cold season vegetable production, and, additionally, year-round employment. In this instance, the agronomic need may be clear, but it is predicated on accepting the assumption that there is a pressing economic need for organic production of this particular crop under these circumstances. Here is where factors such as historical use in organic production, impact on consumers (availability and price of fresh broccoli in the winter), and the other OFPA criteria have to be weighed.